

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

2006 FEB 2 A 9:51

UNITED STATES OF AMERICA,

v.

JIMMY PETE McKENDREE,

) DEBRA P. HACKETT, CLK
) U.S. DISTRICT COURT
) MIDDLE DISTRICT OF ALA
)
) CASE NO. 3:05CR156-A
)

MOTION TO CONTINUE PRE-TRIAL CONFERENCE

Comes now the undersigned, Richard (Cracker) Waldrop, court appointed attorney for the Defendant, Jimmy Pete McKendree, and moves this Court to continue the Pre-Trial Conference which is set for **February 27, 2006 at 1:00 p.m.** and would offer unto the court the following grounds:

1. The undersigned received the appointment of this case by telephone/fax on January 17, 2006 from the Federal Defender Program Inc. of Montgomery, Alabama.
2. The undersigned has traveled to see the defendant at the Montgomery City Jail on two (2) occasions since that date.
3. The undersigned received file and discovery materials from the Federal Defender Program Inc., on or about January 30, 2006 and noted from review of same that a Pre-Trial Conference had been set for February 27, 2006.
4. Prior to receiving the appointment, the undersigned had made plans to attend an out-of-state conference from February 25, 2006 thru March 1, 2006, has paid booked housing and paid air fare transportation costs.
5. The Defendant advised the undersigned that he is still intending to cooperate with the Government and enter a plea of guilty.

Wherefore the undersigned prays this court will continue the Pre-Trial Conference of this case past the February 27, 2006 date.

Respectfully submitted this 1st day of February, 2006.


Richard (Cracker) Waldrop

ASB-2398-L57R

Attorney for Defendant

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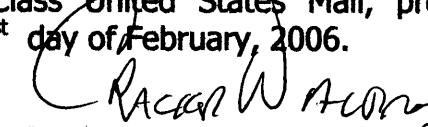
CERTIFICATE OF SERVICE

I, Richard (Cracker) Waldrop, do hereby certify that a copy of the foregoing pleading has been served upon the following:

Jimmy Pete McKendree – Inmate
C/O Montgomery City Jail
P. O. Box 159
Montgomery, Alabama 36101

A. Clark Morris
Assistant U.S. Attorney
U.S. Attorney's Office
One Court Square – Suite 201
Montgomery, Alabama 36301

by mailing the same to them by First Class United States Mail, properly addressed and postage prepaid on this the 1st day of February, 2006.


Of Counsel